

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

THE BOYD LAW GROUP, L.C.,)	
)	
Plaintiff,)	
)	CASE NO. 4:12-CV-1744-JAR
)	
)	
v.)	
)	
SAINT LOUIS COUNTY, MISSOURI,)	
)	
)	
Defendant)	

JOINT PROPOSED SCHEDULING PLAN

Pursuant to this Court's Order dated December 4, 2012, which set a Rule 16 Scheduling Conference for December 12, 2012 the parties have conferred and submit the following Joint Proposed Scheduling Plan:

- (a). The parties agree that Track 2 is an appropriate track assignment;
- (b). All motions for joinder of additional parties and amendment of pleadings shall be filed no later than February 19, 2013;
- (c). Discovery Plan:
 - i. The parties anticipate no issues with regard to electronically stored information and said discovery will be addressed through normal discovery procedures.
 - ii. The parties presently have no agreement regarding asserting claims of privilege or of protection as trial preparation material after production, but the parties do not presently anticipate any problems with this;
 - iii. The parties will disclose information and exchange documents pursuant to Rule 26(a)(1) on or before January 31st, 2013.
 - iv. Discovery need not be conducted in phases or limited to certain issues;

- v. The parties agree that expert witnesses' identities and reports will be provided as follows:
 1. Plaintiff's experts shall be identified by and reports made available by March 1, 2013 and experts made available for deposition by April 1, 2013;
 2. Defendants' experts shall be identified by and reports made available by May, 1, 2013 and made available for deposition by June 3, 2013;
- vi. The presumptive limits of ten (10) depositions per side and twenty-five (25) interrogatories per party should apply in this case;
- vii. A physical or mental examination of the Plaintiff is not anticipated.
- viii. It is not anticipated by the parties that there should be any other issues with regard to the completion of discovery other than the deadlines set forth herein;
- viii All discovery will be completed by June 12, 2013;
- ix No other matters pertinent to the completion of discovery are anticipated.

(d). The position of the parties is that it is not necessary to refer this action to mediation or early neutral evaluation, but that the parties are willing to discuss the issues with each other and with the Court.

(e) Motions to dismiss or for summary judgment or other dispositive motions shall be filed by August 12, 2013. Motions to exclude testimony shall be filed by October 11, 2013.

(f) . This case should be reasonably be expected to be ready for trial by December 2, 2013.

(g). The parties estimate this trial will take two to three days.

(h). There are no other matters that counsel deem appropriate for inclusion in this Joint Proposed Scheduling Plan at this time.

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CERTIFICATE OF SERVICE

I hereby certify that on December 6th, 2012, I electronically filed the Parties' Joint Proposed Scheduling Plan with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties/attorneys of record.

/s/ Michael E. Boyd